

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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-	:	
UNITED STATES OF AMERICA	:	TO BE FILED UNDER
	:	SEAL
- v. -	:	
	:	STIPULATED
KAMRAN FARIDI,	:	PROTECTIVE ORDER
	:	
Defendant.	:	20 Cr. 441 (CS)
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CATHY SEIBEL, District Judge:

WHEREAS, on or about September 18, 2020, KAMRAN FARIDI, the defendant, pleaded guilty to Superseding Information No. S1 20 Cr. 441 (CS);

WHEREAS, KAMRAN FARIDI, the defendant, is scheduled to be sentenced on December 18, 2020;

WHEREAS, the Government would like to produce a letter (the "Protected Letter") to KAMRAN FARIDI, the defendant, and his attorney, Jeffrey Chabrowe, Esq., with information regarding the defendant that may be relevant to sentencing in this matter;

WHEREAS, the Letter contains extremely sensitive information regarding ongoing law enforcement investigations and activities that, if disseminated to third parties, could, among other things, implicate the safety of others and impede ongoing investigations;

WHEREAS, the Government desires to protect the safety of others and ongoing investigations disclosed in the Protected Letter; and

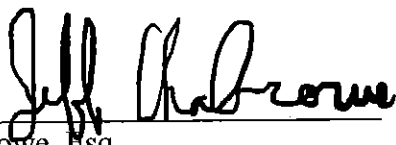
WHEREAS, in the interest of expediting receipt of the Protected Letter, KAMRAN FARIDI, the defendant, by his attorney, Jeffrey Chabrowe, Esq., consents to the entry of this Order;

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Protected Letter and the information contained therein shall not be disseminated beyond KAMRAN FARIDI, the defendant, and Jeffrey Chabrowe, Esq., defense counsel.
2. The Protected Letter and the information contained therein shall be used by the defendant and defense counsel only for purposes of defending the charges, in connection with sentencing, and pursuing any appeals, in this criminal action.
3. The Government will mark the Protected Letter as subject to this protective order.
4. The Protected Letter and the information and identities contained or disclosed therein:
 - (a) Shall be used by the defendant or his counsel only for purposes of this action;
 - (b) Shall not be further disseminated in any form by the defendant or his counsel;
 - (c) Shall be returned to the Government following the conclusion of this case.
5. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any judge or magistrate of this Court in connection with the above-captioned matter.
6. To the extent that the defendant or defense counsel would like to reference or discuss the information contained in the Protected Letter (*e.g.*, in a sealed letter or a sealed proceeding), such discussion must be accompanied by a sealing request to the Court.

6. The proceedings and filings in this case are currently under seal. This Order shall be filed under seal given the sensitivities involved in this case, including the defendant's former role as a confidential human source on counterterrorism matters for the Federal Bureau of Investigation.

AGREED AND CONSENTED TO:



Jeffrey Chabrowe, Esq.
Attorney for Kamran Faridi

11/20/2020

Date

SO ORDERED:



THE HONORABLE CATHY SEIBEL
UNITED STATES DISTRICT JUDGE

11/25/2020
Date